



Helping Youth & Community from Start to Finish

Modern Slavery and Human Trafficking Statement 2025-2026

Introduction

OnTrak works primarily with UK-based suppliers and contractors, their employees are protected under UK employment law and working time directives. Whilst we do not conduct business in countries where there is a documented problem with human trafficking or modern slavery, we remain acutely aware of the need to ensure that companies within our supply chain share our commitment to treating employees fairly and ethically.

OnTrak is committed to the highest standards of ethical conduct in all our activities and to making continuous improvements in this area. We believe that there is a low risk of slavery or human trafficking having a connection with our activities.

This statement is an expression of our commitment to improving our practices to combat modern slavery and human trafficking both within OnTrak and within our supply chains to ensure that we are fully compliant with the Modern Slavery Act 2015 and the latest updates therein. Also see our Behaviour policy which includes Staff conduct and whistleblowing, Safeguarding policy which includes safer recruitment and our commitment to KCSIE, Equality and Diversity policy and Online Safety policy.

All OnTrak's policies are reviewed on an annual basis in response to longevity, statutory or regulatory change and provision feedback.

Due diligence processes

OnTrak enforces due diligence in our safer recruitment processes and working with other organisations. OnTrak operates a comprehensive and transparent recruitment and selection process, incorporating the provisions of the "Keeping Children Safe in Education" guidelines.

The majority of our staff are employed directly on a permanent or fixed term basis. Those successfully appointed are sourced from multiple recruitment and direct services which utilise a range of direct advertising, social media, databases and existing staff referrals, or via approved third-party agencies.

All employees who join OnTrak are subject to rigorous pre-employment checks to ensure they are genuine applicants operating as free agents with the required level of propriety. These will include verification of identity, references, evidence of qualifications, criminal record disclosure and right-to-work checks.

For roles covered by agency workers, we will ensure that similar checks to those for employees are carried out. This is done by obtaining written verification from the agency that the checks have been conducted and the outcomes are satisfactory. The agencies themselves will have been subject to our due diligence on their organisation.

Fair pay

OnTrak is committed to ensuring that all directly employed and contracted staff receive fair remuneration for the job they perform. This is demonstrated through our commitment to ensuring staff receive, as a minimum, the National Minimum Wage, set annually by the government. This commitment means that all staff, whether employed directly, as contractors or through our sub-contractors, receive at least the appropriate National Minimum Wage.

Whistleblowing

OnTrak encourages all its employees, contractors and other business partners to report any concerns related to their direct activities or supply chains. This includes any circumstances that may give rise to increased risk of slavery or human trafficking. Our Whistle-blowing statement is designed to make it easy for workers to make disclosures, without fear of retaliation.

Risk assessment

OnTrak has assessed the risks of modern slavery and human trafficking as follows:

High risk activities:

We do not believe there to be any high-risk operations within OnTrak or within our supply chain with regards to modern slavery and human trafficking.

Medium risk activities:

We do not believe there to be any medium risk operations within OnTrak or within our supply chain with regards to modern slavery and human trafficking.

Low risk activities

We do not believe there to be any low risk operations within OnTrak or within our supply chain with regards to modern slavery and human trafficking.

Measuring effectiveness

OnTrak strives to maintain the highest standards of employee conduct and ethical behaviour and our policies enhance our commitment to act ethically and with integrity throughout our setting and work-related activities. Policies and procedures are kept under regular review to make sure they reflect the changing needs of OnTrak and of our staff, students and the communities it serves.

Suppliers practice

OnTrak is committed to ensuring that any suppliers adhere to the highest standards of ethics through due diligence. We recognise that modern slavery is a complex supply chain issue and suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

OnTrak will work with its suppliers to ensure that they meet these rigorous standards: any serious violation of our standards will lead to a review and possible termination of the relationship.

Any supply contracts are reviewed and risk assessed regularly with the results reported to our Trustees to ensure that they are complying with the expectations of our trust.

Our commitment

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes our trust's Modern Slavery and Human Trafficking statement for the 2024-2025 academic year.

Signed: *Adrian Woods*

Position: Operations Manager

Dated: 2nd September 2025

Due for Review: 1st^t Sept 2026